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FEDERAL COMMUNICATIONS COMMISSION
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OUR FILE NO.

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MARJORIE R. ESMAN

BY HAND

June 8, 1993

No. 2227.001

Ms. Donna Searcy
Federal Communications Commission
1919 M Street, N. W.
Washington, DC 20554

RE: Amendment of Section 73.202(b)
Table of Allotments,
Point Arena, California
Petition for Rulemaking

Dear Ms. Searcy:

Transmitted herewith for filing is an original and four (4) copies of a Petition for Rulemaking and an Engineering Statement, filed on behalf of Del Mar Trust. Also enclosed is one copy for date-stamping and return.

Should the commission have any questions, kindly direct them to the undersigned.

Sincerely,


Marjorie R. Esman

MRE/vmm
Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of *
*
Amendment of Section 73.202(b) * RM -
Table of Allotments, *
Point Arena, California *

PETITION FOR RULEMAKING

Del Mar Trust (Del Mar), by its Attorneys and pursuant to Section 1.401 et seq. of the Commission's Rules, hereby petitions the Commission to amend Section 73.202(b) of the Table of FM Allotments, to add Channel 272B1 for use at Point Arena, California. In support whereof, the following is shown:

Frequency studies undertaken on behalf of Del Mar demonstrates that Channel 272B1 may be added at Point Arena, California, in accordance with the Commission's minimum distance separation requirements as specified in Section 73.207 of the Commission's Rules. See Engineering Statement, attached hereto as Exhibit 1. For purposes of its study, Del Mar located an area within which transmitters may be located for city-grade service at Point Arena.

The proposed service is in the public interest because it will provide a first commercial FM service to Point Arena, which is effectively shielded from all existing broadcast services at this time. As shown in the attached Engineering Statement, the proposed is fully consistent with the Commission's Rules including Section 73.207 and 73.315

Point Arena is an incorporated community according to the 1990 census. It therefore qualifies as a licensable community under Commission standards. Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 101 (1982).

Del Mar will file an application for a construction permit to build an FM station at Point Arena upon adoption of its proposal by the Commission. Upon receipt of a construction permit, Del Mar promptly will construct the station and commence operation.

IN VIEW OF THE ABOVE, Del Mar Trust respectfully requests that the Commission amend the FM Table of Allotments to add Channel 272B1 at Point Arena, California.

Respectfully submitted,



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Attorneys for Del Mar Trust

Dated: June 8, 1993

ENGINEERING STATEMENT

This statement, and all exhibits included by reference herein, were prepared by (or at the direction of) the undersigned, on behalf of Del Mar Trust, hereinafter "the petitioners", in support of a Petition for Rule Making to amend 47 CFR 73.202(b), the Table of FM Allotments. The petitioners seek to add Channel 272B1 to serve the city of Point Arena, California. Point Arena is an isolated and self-contained oceanside community located on California's North Coast. A small but rugged mountain range separates this area from the outside world. Point Arena has its own post office, city government, and public school system, yet does not receive primary or secondary service from existing broadcast stations, and no FM channels have been allotted.¹ This petition proposes to give the City of Point Arena, and more than 5000 residents of this area, a much needed voice for local, regional, and national news, as well as access to the Emergency Broadcast System.

Allocation Conditions:

The channel specified herein, 272B1 fully meets separation requirements of 47 CFR 73.207 regarding all existing, authorized, and proposed stations, and all allotments established or under consideration as of the date of this petition. The petitioners have determined that the granting of this petition will not preclude future allotments to other, nearby cities in need of first or second FM service. Allocation conditions, including existing and proposed separations, are listed in a table and map labeled "Exhibit E-1", using the reference coordinates for Point Arena, 38° 54' 42" North by 123° 41' 24" West.

Area and Population to be Served:

The allotment specified herein, when operated at maximum allowed Class B1 power and antenna height, would provide primary (70 dBu) service to all of Point Arena and the surrounding coastal plain. Secondary (57 dBu) service would be provided to other coastal communities from Fort Bragg to Anchor Bay, reaching a total population of approximately 16,500. This is shown on a map labeled "Exhibit E-2".

Public Interest:

Granting of this petition is in the Public Interest because the allotment requested will provide a first commercial FM service to the city of Point Arena, which is effectively terrain shielded from all existing broadcast services at this time.¹ Separation and service contours for existing and proposed FM broadcast stations near Point Arena are shown in Exhibit E-3. Establishment of the proposed service to Point Arena will not preclude future service to any communities that do not currently have FM service.

¹ KWAN, channel 263B1 at Gualala, CA, may become operational before the instant petition is granted. In this case, the proposed station would provide the second commercial FM service to Point Arena and vicinity.

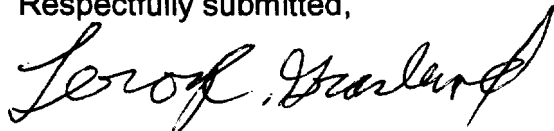
**ENGINEERING STATEMENT re: PETITION FOR RULEMAKING
DEL MAR TRUST - POINT ARENA, CA
PAGE TWO**

Conclusion:

Granting of this Petition for Rulemaking, and subsequent allotment of FM channel 272B1 to Point Arena, California, is in the public interest, and is in compliance with all applicable FCC rules governing the allocation of FM Broadcast Resources. The petitioners have demonstrated that construction of a full-power Class B1 facility will provide primary (70 dBu) service to all of Point Arena, and that operation of the proposed facility will not cause interference to any existing or proposed station(s), nor will it serve to preclude service to any other community.

This statement was prepared on behalf of the petitioners by Leroy C. Granlund, who was retained by the petitioners for this purpose, and whose qualifications are known to the Commission. Statements and conclusions presented herein are based upon data derived from the FCC FM Database, the NGDC 30 Second Terrain Database, and the U.S. Census Bureau Database. Calculations and interpretation of data conform to FCC Rules and Regulations, 47 CFR 1 and 73, and established engineering practices. All information and statements presented herein are correct and true of my personal knowledge and belief, as of the filing date of this petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leroy C. Granlund". The signature is fluid and cursive, with a large initial "L" and a long, sweeping underline.

Leroy C. Granlund
for Del Mar Trust, the Petitioners

June 1, 1993

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
NEW	Willits	CA	218	B1	A	58.7	14.0	38.3°	44.7
KXFX	Santa Rosa	CA	269	B1	L	100.0	50.0	116.6°	50.0
ALC	Santa Rosa	CA	269	B1	U	93.6	50.0	120.8°	43.6
KDFCFM	San Francisco	CA	271	B	L	157.3	145.0	138.6°	12.3
ALC	San Francisco	CA	271	B	U	157.3	145.0	138.6°	12.3
ALC	Weed	CA	272	C1	U	297.3	233.0	24.2°	64.3
K272CD	Ukiah	CA	272	D	L	56.5	0.0	66.2°	56.5
KWHO	Weed	CA	272	C1	C	297.3	233.0	24.2°	64.3
KSFM	Woodland	CA	273	B	L	174.5	145.0	101.8°	29.5
ALC	Woodland	CA	273	B	U	174.5	145.0	101.8°	29.5

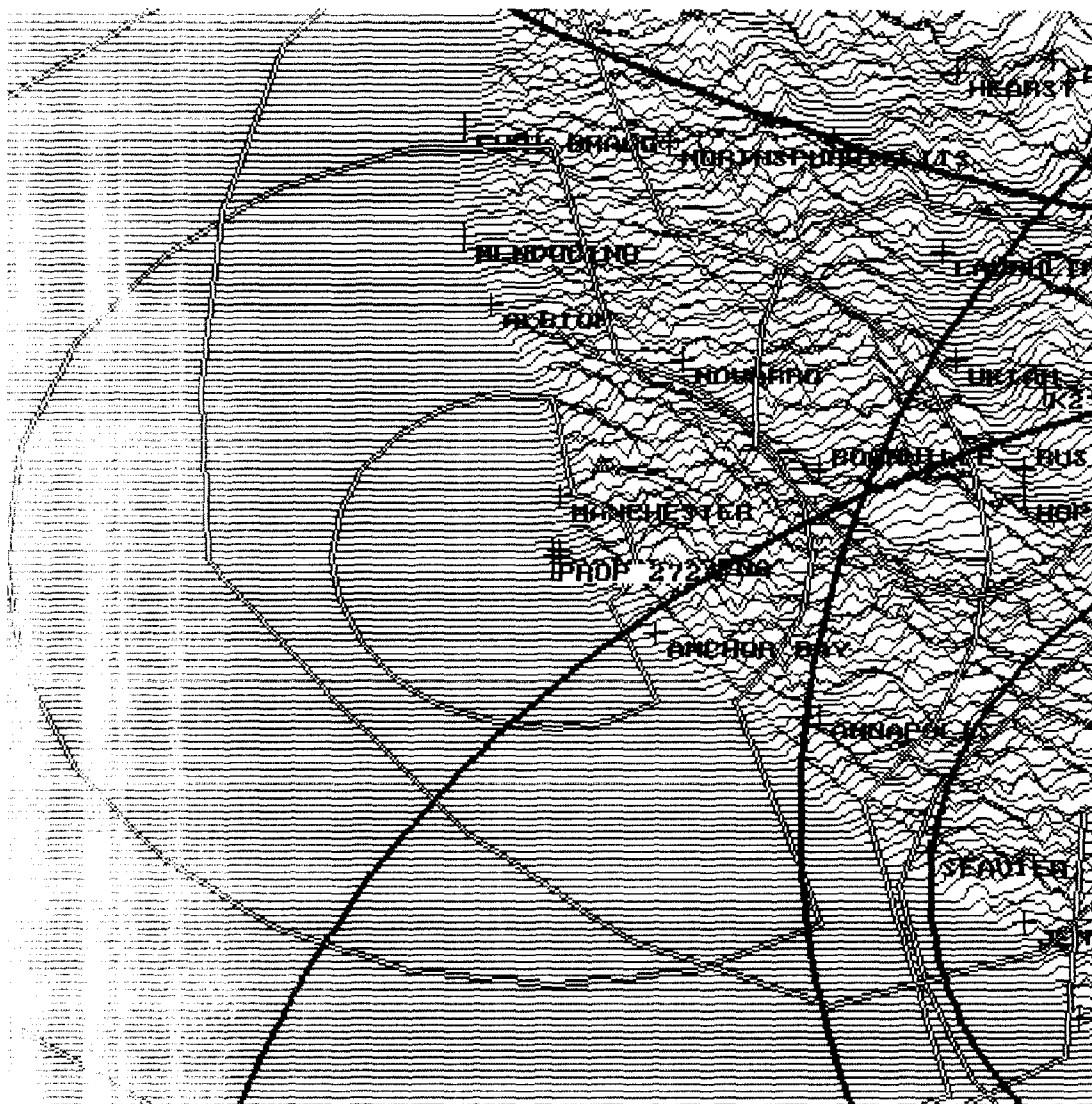
Channel 272B1 clear by 12.3 kilometers.

Any key to draw map...

EXHIBIT E-1 ALLOCATION CONDITIONS

CHANNEL 272B1 - POINT ARENA, CALIFORNIA

PAGE ONE



Green is service,
Red is interfering.
F3-F6 boundaries.

```
Power: 25.000 kW
Freq.: 102.3 MHz
B=reset base elev
C=color increment
D=Flat terrain
F=FCC Comm. Seps
$=scale in km.
To change size of
square in km.:
1=400 km.
2=200 km.
3=125 km.  <-CURRENT
4=100 km.
5= 75 km.
6= 50 km.
```

```
38-54-42 123-41-24
NOTE: Patterns and
site locations are
drawn at base level
v ft per pix= 144
ft per color= 550
Base= 0
```

■=5500+
 ■=4950+
 ■=4400+
 ■=3850+
 ■=3300+
 ■=2750+
 ■=2200+
 ■=1650+
 ■=1100+
 ■=550+
 ■=275-550
 ■=20-275
 ■=Base
 ■<0

E=Edit, ESC to Exit

EXHIBIT E-1 ALLOCATION CONDITIONS

CHANNEL 272B1 - POINT ARENA, CALIFORNIA

PAGE TWO

124 0

N. 38 54 42
W. 123 41 24

123 0

ERP: 25.0 kW, AMSL: 207 Meters, 70 dBu.

39 30

Base=0
Z=ht/1000
MIN=0
MAX=5400
4320+
3780+
3240+
2700+
2160+
1620+
1080+
540+
270-540
20-270 ft.
base level
below base

38 30

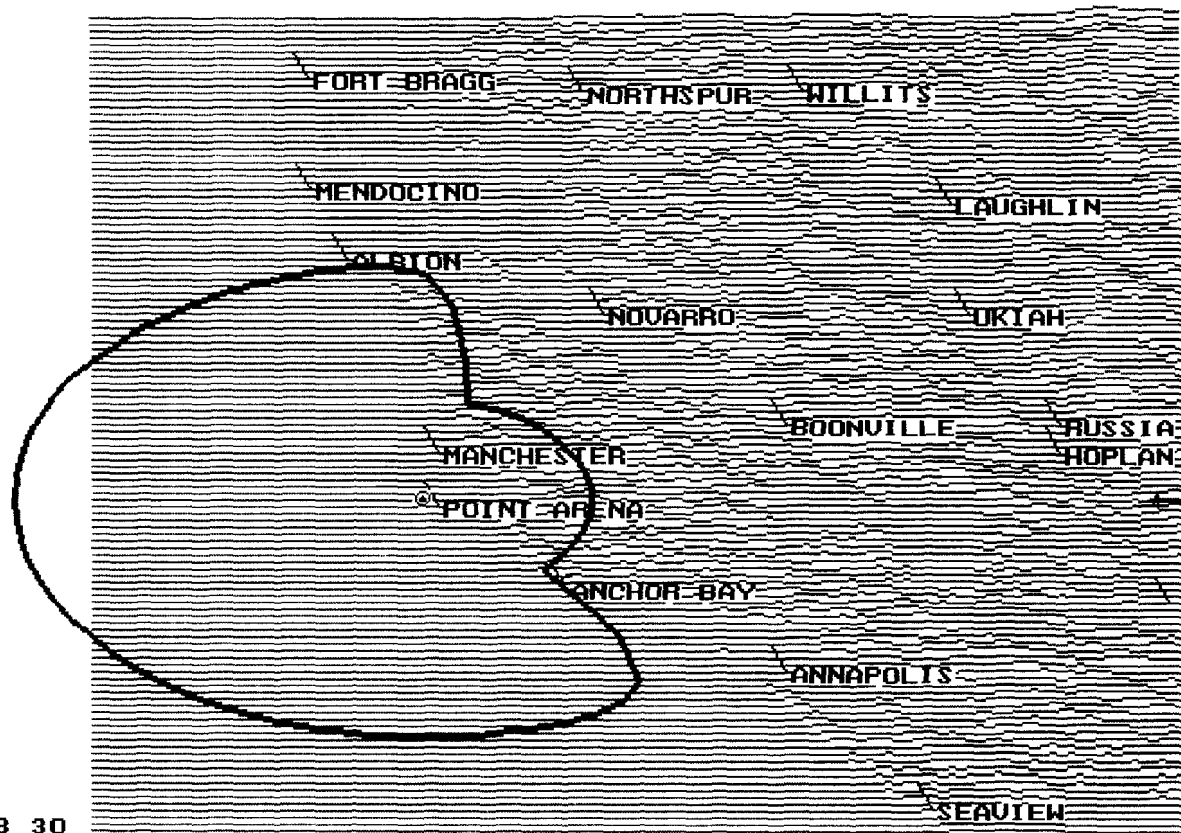


EXHIBIT E-2 PROPOSED PRIMARY SERVICE

CHANNEL 272B1 - POINT ARENA, CALIFORNIA

25.0 kW
207 M.
57 dBu

9:Contour
ESC=Menu
Base=0

4320+
3780+
3240+
2700+
2160+
1620+
1080+
540+
270-540
20-270 ft.
base level
below base

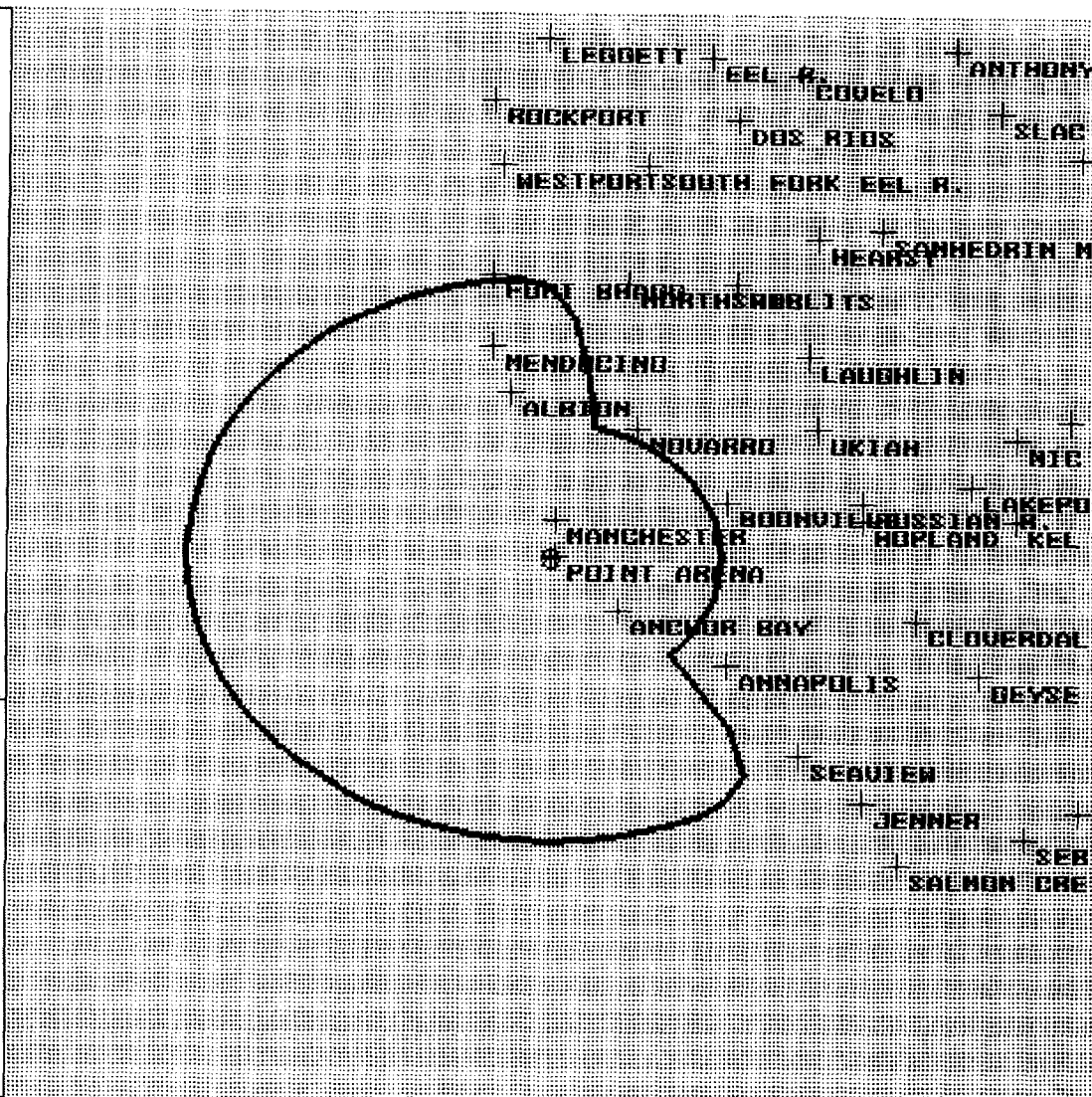


EXHIBIT E-2 PROPOSED SECONDARY SERVICE

CHANNEL 272B1 - POINT ARENA, CALIFORNIA

PAGE TWO

Any key to draw map...

KZYX Philo

ALC Gualala

KWAN Gualala

CA 214 B L 19.1 0.0 49.8° 19.1 514 3.4

CA 263 B1 U 21.4 0.0 138.9° 21.4

CA 263 B1 C 14.1 0.0 132.5° 14.1

EXHIBIT E-3 FM STATIONS AND CHANNEL ALLOCATIONS NEAR POINT ARENA

PAGE ONE

NAPFM Map Display :

Search Radius : 40
Scale (Kilometers): 10

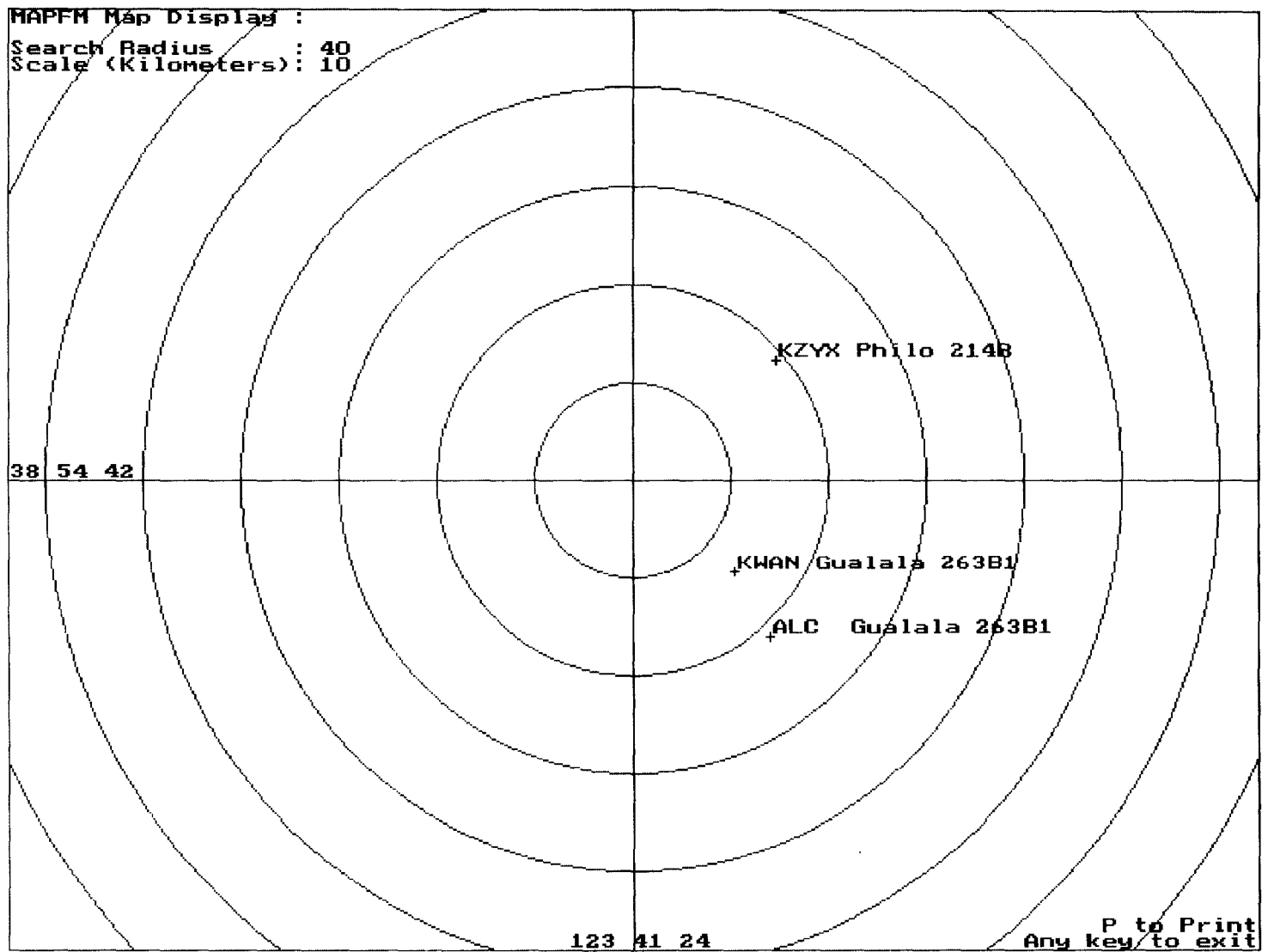


EXHIBIT E-3 FM STATIONS AND CHANNEL ALLOCATIONS NEAR POINT ARENA

PAGE TWO